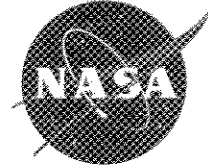


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



February 17, 2011

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Widely Attended Gathering Determination Regarding Attendance by NASA Employees at the National Space Club's Breakfast on February 17, 2011

On February 17, 2011, the National Space Club (NSC) will host and sponsor a breakfast at the Ritz-Carlton, Pentagon City, Virginia from 8 AM to 10 AM. The premier co-sponsors are Boeing Corporation and Aerojet-General Corporation. The speaker for the luncheon will be Charles Bolden, NASA Administrator. The NSC is a non-profit organization under Section 501(c)(6) of the IRS code that does not employ lobbyists, and which is composed of individual and corporate members, including NASA contractors.

The breakfast will be attended by senior leaders of the aerospace industry, congressional staff, representatives from academia and the media, personnel from other Federal agencies, and other members of the general public. Approximately 100 people have been invited. The estimated cost of the breakfast, which includes all food and beverages, is \$55.00 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the luncheon will allow NASA representatives to hear Mr. Bolden speak on the NASA challenges and opportunities, and to exchange views and ideas with others in attendance. Accordingly, NASA employees whose duties do not substantially affect the NSC, or a majority or all of its corporate members, may accept an invitation for free attendance to the luncheon. A current list of NSC corporate members is available at <http://www.spaceclub.org/about/corporate.html>.

However, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may only attend if they reimburse the sponsors the cost of the event for themselves and accompanying guests. NASA employees whose duties may substantially affect the sponsors or a majority of their members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone